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December 9, 2010

VIA E-MAIL/RESS

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
27th Floor; 2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Walli

Re: EB-2010-0110 PowerStream Inc. 2011 IRM Adjustment
Interrogatories of Vulnerable Energy Consumers Coalition (VECC)

Please find enclosed VECC's interrogatories regarding the above application.

Yours truly,

Original signed

Michael Buonaguro
Counsel for VECC

Encl.
Cc Tom Barrett
Manager, Rate Applications PowerStream

**EB-2010-0110 PowerStream Inc. 2011 IRM Adjustment
VECC IRs**

LRAM SSM

VECC IR# 1

References: Appendix 3 SeeLine Report pages 8 &9 and Tables 4&5

Preamble: Using its SeeTool™ software SeeLine has reviewed PowerStream's SSM claim and finds that the prescriptive measure and input assumptions used by PowerStream are those currently posted by the OPA which is in accordance to Board policy. Results from this analysis are shown in the tables below.

- a) Confirm that the current CDM Guidelines and Policy Letter as referenced above specify that

SSM

Assumptions used from the beginning of any year will be those assumptions in existence in the immediately prior year. For example, if any input assumptions change in 2007, those changes should apply for SSM purposes from the beginning of 2008 onwards until changed again....

- b) Confirm that the SSM Claims used only input assumptions from the OPA 2010 Prescriptive Measures and Input Assumptions Lists. If not, then list all exceptions and the sources of the inputs.
- c) When (year and date) did the OPA change its Input assumptions (unit savings and free ridership) for CFLs under the Every Kilowatt Counts Campaigns
- d) Provide a copy of the SeeLine EKC calculators before and after the change
Confirm /Show how the EKC assumptions compare to the latest OPA Prescriptive Measures and Input Assumptions
- e) Provide a copy of the spreadsheet showing the SSM calculation as filed.
Reconcile to Tables 4 and 5
- f) Explain
- i. why the free ridership was maintained at historic levels for mass market measures and
 - ii. whether a persistence factor should be applied to CFLs installed in 2005 and 2006

VECC IR# 2

References: Appendix 3 SeeLine Report Appendices A & B

Preamble: As part of its review SeeLine conducted the following activities as outlined by the OEB in its Guidelines:

- Confirm that the inputs are those in accordance to Board's policy.
Where any inputs assumptions have changed in previous years, confirm that the input assumptions were implemented consistent with section 7.3 of the Guidelines;
- Where the distributor has varied from the input assumptions

posted on the Board's website, review the reasonableness for the input assumptions used..

- a) For LRAM the Guidelines and Policy Letter of January 27, 2009 Specify that **LRAM**

The input assumptions used for the calculation of LRAM should be the best available at the time of the third party assessment referred to in section 7.5. For example, if any input assumptions change in 2007, those changes should apply for LRAM purposes from the beginning of 2007 onwards until changed again.

Confirm that the LRAM Claims used only input assumptions from the OPA 2010 Prescriptive Measures and Input Assumptions Lists. If not, then list all exceptions and the sources of the inputs.

- b) Confirm the lifetime and free-ridership assumptions for CFLs 2005-2008
- c) For CFLs installed in 2005 should a persistence factor be applied. Please discuss.

VECC IR# 3

References: Appendix 3 SeeLine Report Appendices C&D

- a) Provide **details** of the OPA EKC campaigns from 2006-2009 that add to the data shown in Appendix C&D- Residential lines 10 and 25- Every Kilowatt counts–
- # units
 - unit and total kwh savings,
 - operating hours,
 - lifetime and
 - free ridership
- for each year 2007-2008 (include prior years if required)
- b) Reconcile to
- Appendix C 2007-0.25 Mw, 2008-0.23Mw Total 1.09Mw
2007-1498 Mwh; 2008-1498 Mwh Total 6075 Mwh
- Appendix D 2007-0.07 Mw, 2008-0.06 Mw 2008 Total 0.09 Mw
2007-1761 Mwh; 2008-1739 Mwh total 1600 Mwh
- c) Reconcile the OPA results from Part a) to the savings and revenue for each year and the Total Revenue as reported in the following Tables
- SeeLine Report Page 11 (Barrie) and Pages 16 & 17 (Powerstream South)
 - Managers Summary Schedule 3 (PowerStream South)
2007-252 Kw, 2008-228 Kw;
2007-6,552 Mwh; 2008-6,472 Mwh
LRAM 2007-\$83,871; 2008-\$83,502
 - Managers Summary Schedule 6 (Barrie)

2007-68 Kw, 2008-61 Kw;
2007-1760 Mwh; 2008-1739 Mwh
LRAM 2007-\$22,712; 2008-\$23,481